

PERMIT NO. 5093-135-0339-S-02-0

ISSUANCE DATE:



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: SA Recycling – Doraville

Facility Address: 2800 Amwiler Road,
Doraville, Georgia 30360 Gwinnett County

Mailing Address: 2411 North Glassell Street,
Orange, CA 92865

Facility AIRS Number: 04-13-135-00339

is issued a Permit for the following:

Construction and operation of an automobile shredder and metal recycling facility. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28584 dated September 13, 2022; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages.



Richard E. Dunn, Director
Environmental Protection Division

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ATTACHMENT A

Emission Units No.	Description	Installation Date	Construction Date
GS1	Automobile shredder	2019	2019

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not discharge or cause the discharge into the atmosphere from any process emission unit at the facility any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.
[391-3-1-.02(2)(b)1]
- 2.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the automobile shredder (Source Code: GS1) and any process emission unit at the facility any gases, which contain particulate matter in excess of the rate derived from the equation noted below:
[391-3-1-.02 (2)(e)(1)]
 - a. For process input weight rate up to and including 30 tons per hour:

$$E = 4.1P^{0.67}; \text{ or}$$

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- b. For process input weight rate above 30 tons per hour:

$$E = 55P^{0.11} - 40$$

Where E equals the allowable PM emission rate in pounds per hour and P equals the total dry process input weight rate in tons per hour.

- 2.3 The Permittee shall have an annual output limit of 662,188 tons per 12 consecutive months for shredder output produced by the automobile shredder (Source Code: GS1).
[Avoidance of 40 CFR 70]
- 2.4 The facility is subject to Georgia Rule 391-3-1-.02(2)(tt) - VOC Emissions from Major Sources.
[391-3-1-.02(2)(tt)]
- 2.5 The Permittee shall use the following best management practices for the automobile shredder (Source Code: GS1):
[391-3-1-.02(2)(tt)]
- a. The establishment and maintenance of a comprehensive defluidization program for automobiles and appliances prior to shredding.
- b. Monthly monitoring of output of ferrous and non-ferrous material from the scrap shredder using calibrated belt scales.

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.
[391-3-1-.02(2)(n)]
- 3.2 The Permittee shall take all reasonable precautions to prevent dust from the landfills, plant roads, heavy equipment operations, or any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
[391-3-1-.02(2)(n)]
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing building or structures, construction operations, the grading or roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;

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- d. Covering, at all times when in motion, open bodied trucks that are transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all pollution control equipment. Maintenance records shall be recorded in a permanent form suitable and available for inspection by the Division. The record shall be retained for at least five years following the date of such maintenance.
[391-3-1-.02(6)(b)1]

5. Monitoring

Not applicable.

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
 - a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
 - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
 - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall maintain a daily shredding output log (reported as tons of automobiles and/or light iron, as based on output of ferrous and non-ferrous material using calibrated belt

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scales) for the automobile shredder (Source Code: GS1) as required in Condition 2.5. This information shall be recorded in a permanent form suitable and available for inspection.
[Avoidance of 40 CFR 70]

- 7.2 The Permittee shall implement a scrap acceptance policy and comprehensive defluidization program. The scrap acceptance policy and comprehensive defluidization program should be recorded in a permanent form suitable and available for inspection.
[391-3-1-.02(2)(tt)]
- 7.3 The Permittee shall maintain a monthly operating log of the output of ferrous and non-ferrous material from the automobile shredder using calibrated belt scales using the data obtained in Condition 7.1.
[391-3-1-.02(2)(tt)]
- 7.4 The Permittee shall maintain a log of the defluidization of automobiles and appliances prior to shredding as required by Condition 2.5.
[391-3-1-.02(2)(tt)]
- 7.5 The Permittee shall use the monthly shredder output log (reported as tons of automobiles and/or light iron, as based on output of ferrous and non-ferrous material using calibrated belt scales) required in Condition 7.3, for the automobile shredder (Source Code: GS1) to calculate the 12-consecutive month output to demonstrate compliance with the limit in Condition 2.3. This information shall be recorded in a permanent form suitable and available for inspection.
[Avoidance of 40 CFR 70]
- 7.6 The Permittee shall notify the Division in writing within 15 days of occurrence if the monthly shredding output from the automobile shredder required by Condition 7.3 exceeds one-twelfth of its rolling annual limit (55,182 tons) during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the twelve-consecutive month limit stated in Condition 2.3. This information shall be recorded in a permanent form suitable and available for inspection.
[Avoidance of 40 CFR 70]
- 7.7 The Permittee shall report any exceedance of the limit in Permit Condition 2.3 to the Division within 15 days of occurrence. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the twelve-consecutive month limit stated in Condition 2.3.
[391-3-1-.02(6)(b)1].

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8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."